

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
CHARLESTON DIVISION

Kelly Ward,) Civil Action No. 2:22-cv-3243-RMG
)
Plaintiff,)
)
vs.) **NOTICE OF REMOVAL**
)
Tractor Supply Company,)
)
Defendant.)
)

The defendant, Tractor Supply Company, by and through its undersigned attorneys, files the Notice of Removal of the above-entitled action from the Court of Common Pleas for Georgetown County, State of South Carolina, to the United States District Court for the District of South Carolina, Charleston Division, pursuant to 28 U.S.C. §§ 1331, 1332, 1441, and 1446, on the following grounds:

1. The above-entitled action was instituted by the plaintiff against the defendant, by the service of a Summons and Complaint, which was served upon the defendant, Tractor Supply Company, on August 24, 2022, and this action is now pending in the Court of Common Pleas for Georgetown County, State of South Carolina, being Civil Action No. 2022-CP-22-00708.

2. At the time of the commencement of the action, the plaintiff, upon information and belief, was and still is a citizen and resident of the County of Georgetown, State of South Carolina.

3. The defendant, Tractor Supply Company, is a publicly held company with its principal place of business in Tennessee. It is the parent of the following companies: Del's Farm Supply, Tractor Supply Company of Michigan, and Pet Sense.

4. This action is of a civil nature and involves a controversy that is wholly between citizens of different states and the value of the matter in dispute in said cause is believed to exceed the sum of Seventy-Five Thousand and No/100 (\$75,000.00) Dollars, exclusive of interest and costs based on the representation of plaintiff's counsel. Therefore, the defendant respectfully believes the jurisdictional threshold is established. Based on this information, said action, upon information and belief, is one over which the District Court of the United States has original jurisdiction.

5. Defendant files together with this Notice a copy of all process, pleadings and orders served upon it in this action in compliance with Rule 11, Federal Rules of Civil Procedure.

6. Defendant has provided a copy of the Notice of Removal to the Clerk of Court for Georgetown County.

7. Defendant, pursuant to 28 U.S.C. §1446(d), shall promptly give written notice of removal to all adverse parties and shall file a copy of the Notice with the Clerk of Court, Georgetown County, State of South Carolina.

8. Removing defendant is filing this Notice solely by reason of the requirements of 28 U.S.C. § 1446 and this Notice has been timely filed pursuant to 28 U.S.C. § 1446(b).

9. The defendant reserves all defenses, including, but not limited to, those under Rule 12(b) of the Federal Rules of Civil Procedure, and does not waive said defenses by the filing of this Notice to all adverse parties.

Respectfully submitted,

ROBINSON GRAY STEPP & LAFFITTE, L.L.C.

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